



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN - 9 2018

REPLY TO THE ATTENTION OF:

LC-17J

VIA EMAIL

Mr. Michael T. Novak
Vice President/General Counsel
Keller and Heckman LLP
1001 G Street NW, Suite 500 West
Washington, DC 20001

Novak@khlaw.com

Consent Agreement and Final Order In the Matter of Stepan Company, Docket
Number **FIFRA-05-2018-0013**

Mr. Novak:

Enclosed please find a copy of a fully executed Consent Agreement and Final Order in resolution of the above case. This document was filed on January 9, 2018 with the Regional Hearing Clerk.

The civil penalty in the amount of \$131,440 is to be paid in the manner described in paragraphs 174 and 175. Please be certain that the docket number is written on both the transmittal letter and on the check. Payment is due within 30 calendar days of the filing date.

Thank you for your cooperation in resolving this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Claudia Niess".

Claudia Niess
Pesticides and Toxics Compliance Section

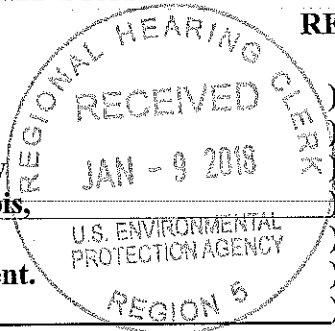
Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:

**Stepan Company
Northfield, Illinois,**

Respondent.



Docket No. FIFRA-05-2018-0013

**Proceeding to Assess a Civil Penalty
Under Section 14(a) of the Federal
Insecticide, Fungicide, and Rodenticide
Act, 7 U.S.C. § 136l(a)**

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 14(a) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136l(a), and Sections 22.13(b) and 22.18(b)(2) and (3) of the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits* (Consolidated Rules) as codified at 40 C.F.R. Part 22.

2. The Complainant is the Director of the Land and Chemicals Division, U.S. Environmental Protection Agency, Region 5.

3. The Respondent is Stepan Company (Stepan), a corporation doing business in the State of Illinois.

4. Where the parties agree to settle one or more causes of action before the filing of a ~~complaint, the administrative action may be commenced and concluded simultaneously by the~~ issuance of a consent agreement and final order (CAFO). 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the assessment of the civil penalty specified in this CAFO, and to the terms of this CAFO.

Jurisdiction and Waiver of Right to Hearing

7. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

8. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO.

9. Respondent certifies that it is complying with FIFRA, 7 U.S.C. §§ 136 to 136y.

Statutory and Regulatory Background

10. Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), states that it is unlawful for any person in any state to distribute or sell to any person any pesticide that is misbranded.

11. Section 2(q)(1)(A) of FIFRA, 7 U.S.C. § 136(q)(1)(A), states that a pesticide is misbranded if its labeling bears any statement which is false or misleading. 40 C.F.R. §§ 156.10(a)(5) provides examples of false and misleading statements, which includes a true statement used in such a manner as to give a false or misleading impression to the buyer. 40 C.F.R. §§ 156.10(a)(5)(vii).

12. Section 2(q)(1)(F) of FIFRA, 7 U.S.C. § 136(q)(1)(F), states that a pesticide is misbranded if the label does not contain directions for use which are necessary for effecting the purpose for which the product is intended and if complied with, are adequate to protect health and the environment. See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii), (iv) and (ix), 156.140.

13. Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), states that a pesticide is misbranded if the label does not contain a warning or caution statement which may be necessary and if complied with, together with any other requirements imposed under Section 3(d) of

FIFRA, is adequate to protect health and the environment. See also 40 C.F.R. §§ 156.10(a)(1)(vii), 156.70, 156.80 and 156.85.

14. 40 C.F.R. § 152.132 states that supplemental distribution is permitted upon notification to the Agency if all of the following conditions are met: (a) The registrant has submitted to the Agency for each distributor product a statement signed by both the registrant and the distributor listing the names and addresses of the registrant and the distributor, the distributor's company number, the additional brand name(s) to be used, and the registration number of the registered product, (b) The distributor product is produced, packaged and labeled in a registered establishment operated by the same producer who produces, packages, and labels the registered product, (c) The distributor product is not repackaged (remains in the producer's unopened containers), (d) The label of the distributor product is the same as that of the registered product, except that the product name of the distributor product may be different, the name and address of the distributor may appear instead of that of the registrant, the registration number of the registered product must be followed by a dash, followed by the distributor's company number, the establishment number must be that of the final establishment at which the product was produced, and specific claims may be deleted, provided that no other changes are necessary, and (e) Voluntary cancellation of a product applies to the registered product and all distributor products distributed or sold under that registration number.

15. 40 C.F.R. § 152.132 also specifies that a distributor is considered an agent of the registrant for all intents and purposes under FIFRA, and both the registrant and the distributor may be held liable for violations pertaining to the distributor product.

16. The term "person" means "any individual, partnership, association, corporation, or any organized group of persons whether incorporated or not." 7 U.S.C. § 136(s).

17. The term “distribute or sell” means “to distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received) deliver or offer to deliver.” 7 U.S.C. § 136(gg).

18. A “pesticide” is, among other things, any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest. 7 U.S.C. § 136(u).

19. A “pest” is any insect, rodent, nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism which the Administrator of U.S. EPA declares to be a pest under Section 25(c)(1) of FIFRA. 7 U.S.C. § 136(t).

20. The Administrator of EPA may assess a civil penalty against any registrant, commercial applicator, wholesaler, dealer, retailer, other distributor who violates any provision of FIFRA of up to \$7,500 for each offense that occurred after January 12, 2009 but before November 2, 2015, pursuant to Section 14(a)(1) of FIFRA, 7 U.S.C. § 136l(a)(1), and 40 C.F.R. Part 19.

Factual Allegations and Alleged Violations

21. Respondent is a “person” as defined at Section 2(s) of FIFRA, 7 U.S.C. § 136(s).

22. Respondent is a “registrant” as defined at Section 2(z) of FIFRA, 7 U.S.C. § 136(z).

23. At all times relevant to this Complaint, Respondent owned or operated a place of business located at 22 W. Frontage Road, Northfield, Illinois.

24. At all times relevant to the Complaint, Ipax Cleanogel, Inc. (Ipax) owned and operated a place of business located at 8301 Lyndon Avenue, Detroit, Michigan, 48238.

25. EPA assigned company numbers 5166 and 51663 to Ipax.

26. On or about February 19, 2015, an inspector employed by the Michigan Department of Agriculture and Rural Development and authorized to conduct inspections under FIFRA conducted an inspection at Ipax, located in Detroit, Michigan.

CD-256 Neutral Disinfectant Cleaner, EPA Reg. No. 1839-167-51663

27. On or about March 11, 1994, EPA registered Stepan's pesticide product, **BTC 885 Neutral Disinfectant Cleaner-256**.

28. EPA assigned **BTC 885 Neutral Disinfectant Cleaner-256**, EPA Registration Number (Reg. No.) 1839-167.

29. On or about May 5, 2010, the EPA accepted a label for **BTC 885 Neutral Disinfectant Cleaner-256**, EPA Reg. No. 1839-167.

30. On or about April 10, 2009, Stepan and Ipax submitted a Notice of Supplemental Distribution of a Registered Pesticide Product (Notice of Supplemental Distribution) to the EPA for **BTC 885 Neutral Disinfectant Cleaner-256**.

31. The Notice of Supplemental Distribution identified Ipax as the distributor of **BTC 885 Neutral Disinfectant Cleaner-256**.

32. The Notice of Supplemental Distribution identified the distributor product name for **BTC 885 Neutral Disinfectant Cleaner-256** as **CD-256 Neutral Disinfectant Cleaner**.

33. **CD-256 Neutral Disinfectant Cleaner** is assigned EPA Reg. No. 1839-167-51663.

34. **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, is a "pesticide" as that term is defined in Section 2(u) of FIFRA.

35. The distributor, Ipax, is an agent of the registrant, Stepan, for all intents and purposes under 40 C.F.R. § 152.132 with respect to the distributor pesticide product, **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663.

36. During the February 19, 2015 inspection, the inspector collected shipping records, a bin label and an affidavit for the pesticide product **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663.

37. The bin label collected during the inspection was a true and accurate representation of the product and the associated labels that were released for shipment on or about January 18, 2013, two shipments on March 4, 2013, March 11, 2013, March 18, 2013, March 28, 2013, April 12, 2013, June 26, 2013, October 17, 2013, November 19, 2013, February 12, 2014, September 24, 2014 and October 24, 2014.

38. The bin label for **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, collected during the inspection did not match the label language on the currently accepted label, dated May 5, 2010, as follows:

- a. The “Bacterial Activity” language that appeared on the bin label stated that the product “demonstrates effective disinfectant activity against the organisms: ...*Salmonella choleraesuis*...” The “Bacterial Activity” language that appears on the accepted label states that the product demonstrates effective disinfectant activity against “*Salmonella enterica*.”
- b. The “Physical or Chemical Hazards” language that appeared on the accepted label did not appear on the bin label.
- c. The “Storage and Disposal” language that appeared on the bin label did not match the language on the accepted label nor did the language on the bin label identify whether the container was refillable.

39. On or about January 18, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl.

40. On or about March 4, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sparkle Janitorial Service.
41. On or about March 4, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to IPAX Atlantic Warehouse.
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42. On or about March 11, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sage International.
43. On or about March 18, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Set Enterprises, Inc.
44. On or about March 28, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Union Station.
45. On or about April 12, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl.
46. On or about June 26, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl.
47. On or about October 17, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Pan Asia International (HK) Ltd.
48. On or about November 19, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl.
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49. On or about February 12, 2014, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Brian Miller.
50. On or about September 24, 2014, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Liberty Chemicals Maintenance & Sanitation.

51. On or about October 24, 2014, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sage International.

IPAX S10 Sanitizer, EPA Reg. No. 1839-86-5166

52. On or about April 30, 1981, EPA registered Stepan's pesticide product, **BTC 2125 M 10% Solution**.

53. EPA assigned **BTC 2125 M 10% Solution** EPA Reg. No. 1839-86.

54. On or about October 19, 2012, Stepan and Ipax submitted a Notice of Supplemental Distribution to the EPA for **BTC 2125 M 10% Solution**.

55. The Notice of Supplemental Distribution identified Ipax as the distributor of **BTC 2125 M 10% Solution**.

56. The Notice of Supplemental Distribution identified the distributor product name for **BTC 2125 M 10% Solution** as **IPAX S10 Sanitizer**.

57. **IPAX S10 Sanitizer** is assigned EPA Reg. No. 1839-86-5166.

58. **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, is a "pesticide" as that term is defined in Section 2(u) of FIFRA.

59. The distributor, Ipax, is an agent of the registrant, Stepan, for all intents and purposes under 40 C.F.R. § 152.132 with respect to the distributor pesticide product, **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166.

60. During the February 19, 2015 inspection, the inspector collected shipping records, a bin label and an affidavit for the pesticide product **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166.

61. The bin label of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, collected during the inspection was a true and accurate representation of the product and the associated

labels that were released for shipment on or about February 7, 2013, March 4, 2013, September 24, 2013, two shipments on February 12, 2014, May 1, 2014 and September 11, 2014.

62. The bin label for **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, collected during the inspection claimed that the product “is designed for use in food processing plants, food service establishments, restaurants, bars, hospitals, nursing homes, hotels, schools, homes, athletic facilities where disinfection, sanitization and deodorization is of prime importance” and mentioned hospitals two additional times and disinfection one additional time on the label. The bin label did not include “Directions for Use” for disinfection purposes on the currently accepted label, dated July 17, 2012.

63. In particular, the bin label stated that **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, is “designed for use in food processing plants, food service establishments, restaurants, bars, hospitals, nursing homes, hotels, schools, homes, athletic facilities where disinfection, sanitization and deodorization is of prime importance.” The accepted label requires specific language be included on the label if the label of the product lists medical premises and metal and/or stainless steel surfaces. The required language was missing from the bin label.

64. On or about February 7, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods.

65. On or about March 4, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to IPAX Atlantic Warehouse.

66. On or about September 24, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Liberty Chemicals Maintenance & Sanitation.

67. On or about February 12, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods.

68. On or about February 12, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Brian Miller.

69. On or about May 1, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, Tasty Blend Foods.

70. On or about September 11, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods.

Ipax S200 Sanitizer, EPA Reg. No. 1839-189-5166

71. On or about August 9, 2015, EPA registered Stepan's pesticide product, **BTC 2125M RTU200 Sanitizer**.

72. EPA assigned **BTC 2125M RTU200 Sanitizer** EPA Reg. No. 1839-189.

73. On or about September 14, 2012, Stepan and Ipax submitted a Notice of Supplemental Distribution to the EPA for **BTC 2125M RTU200 Sanitizer**.

74. The Notice of Supplemental Distribution identified Ipax as the distributor of **BTC 2125M RTU200 Sanitizer**.

75. The Notice of Supplemental Distribution identified the distributor product name for **BTC 2125M RTU200 Sanitizer** as **IPAX S200 Sanitizer**.

76. **IPAX S200 Sanitizer** is assigned EPA Reg. No. 1839-189-5166.

77. **IPAX S200 Sanitizer**, EPA. Reg. No. 1839-189-5166, is a "pesticide" as that term is defined in Section 2(u) of FIFRA.

78. The distributor, Ipax, is an agent of the registrant, Stepan, for all intents and purposes under 40 C.F.R. § 152.132 with respect to the distributor pesticide product, **IPAX S200 Sanitizer**, EPA. Reg. No. 1839-189-5166.

79. During the February 19, 2015 inspection, the inspector collected shipping records, a bin label, an affidavit for the pesticide product **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166.

80. The bin label of **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, collected during the inspection was a true and accurate representation of the product and the associated labels that were released for shipment on or about March 4, 2013, May 13, 2013, July 12, 2013 and July 30, 2014.

81. The bin label for **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, collected during the inspection did not match the label language on the currently accepted label, dated November 18, 2010 because the “Environmental Hazards” language that appeared on the accepted label did not appear on the bin label.

82. On or about March 4, 2013, Ipax distributed or sold **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, to IPAX Atlantic Warehouse.

83. On or about July 30, 2014, Ipax distributed or sold **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, to Lakeshore-Rickman LLC.

Counts 1 – 13

CD-256 Neutral Disinfectant Cleaner, EPA Reg. No. 1839-167-51663

Count 1

84. All preceding paragraphs are incorporated by reference.

85. On or about January 18, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R.

§§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

86. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

87. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 2

88. All preceding paragraphs are incorporated by reference.

89. On or about March 4, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sparkle Janitorial Service, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under "Bacterial Activity," "Physical or Chemical Hazards," and "Storage and Disposal." See also 40 C.F.R.

§§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

90. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

91. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 3

92. All preceding paragraphs are incorporated by reference.

93. On or about March 4, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to IPAX Atlantic Warehouse, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,”

“Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R.

§§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

94. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

95. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 4

96. All preceding paragraphs are incorporated by reference.

97. On or about March 11, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sage International, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or

Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

98. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

99. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E) subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 5

100. All preceding paragraphs are incorporated by reference.

101. On or about March 18, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Set Enterprises, Inc., that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under "Bacterial Activity," "Physical or Chemical Hazards," and "Storage and Disposal." See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

102. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

103. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 6

104. All preceding paragraphs are incorporated by reference.

105. On or about March 28, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Union Station, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under "Bacterial Activity," "Physical or

Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

106. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

107. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 7

108. All preceding paragraphs are incorporated by reference.

109. On or about April 12, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

110. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

111. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 8

112. All preceding paragraphs are incorporated by reference.

113. On or about June 26, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

114. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

115. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 9

116. All preceding paragraphs are incorporated by reference.

117. On or about October 17, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Pan Asia International (HK) Ltd., that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C.

§ 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

118. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

119. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 10

120. All preceding paragraphs are incorporated by reference.

121. On or about November 19, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Garden Bowl, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under "Bacterial Activity," "Physical or Chemical Hazards," and "Storage and Disposal." See also 40 C.F.R. §§156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

122. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

123. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 11

124. All preceding paragraphs are incorporated by reference.

125. On or about February 12, 2014, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Brian Miller, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

126. Ipax’s distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

127. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 12

128. All preceding paragraphs are incorporated by reference.

129. On or about September 24, 2013, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Liberty Chemicals Maintenance & Sanitation, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under “Bacterial Activity,” “Physical or Chemical Hazards,” and “Storage and Disposal.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

130. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

131. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 13

132. All preceding paragraphs are incorporated by reference.

133. On or about October 24, 2014, Ipax distributed or sold **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, to Sage International, that was misbranded as that term is defined at Section 2(q)(1)(F) and (G) of FIFRA, 7 U.S.C. § 136(q)(1)(F) and (G), because the label on the container did not contain language required under "Bacterial Activity," "Physical or Chemical Hazards," and "Storage and Disposal." See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iv) and (ix), 156.70 and 156.140.

134. Ipax's distribution or sale of **CD-256 Neutral Disinfectant Cleaner**, EPA Reg. No. 1839-167-51663, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

135. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Counts 14 – 20 **IPAX S10 Sanitizer, EPA Reg. No. 1839-86-5166**

Count 14

136. All preceding paragraphs are incorporated by reference.

137. On or about February 7, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under “Directions for Use.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

138. Ipax’s distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

139. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 15

140. All preceding paragraphs are incorporated by reference.

141. On or about March 4, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to IPAX Atlantic Warehouse, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under “Directions for Use.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

142. Ipax’s distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

143. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 16

144. All preceding paragraphs are incorporated by reference.

145. On or about September 24, 2013, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Liberty Chemicals Maintenance & Sanitation, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under “Directions for Use.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

146. Ipax’s distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

147. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 17

148. All preceding paragraphs are incorporated by reference.

149. On or about February 12, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under “Directions for Use.” See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

150. Ipax’s distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

151. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 18

152. All preceding paragraphs are incorporated by reference.

153. On or about February 12, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Brian Miller, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under "Directions for Use." See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

154. Ipax's distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

155. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 19

156. All preceding paragraphs are incorporated by reference.

157. On or about May 1, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under "Directions for Use." See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

158. Ipax's distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

159. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Count 20

160. All preceding paragraphs are incorporated by reference.

161. On or about September 11, 2014, Ipax distributed or sold **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, to Tasty Blend Foods, that was misbranded as that term is defined at Sections 2(q)(1)(A) and (F) of FIFRA, 7 U.S.C. §§ 136(q)(1)(A) and (F), because the label on the container was false and misleading and did not contain language required under "Directions for Use." See also 40 C.F.R. §§ 156.10(a)(1)(viii), 156.10(i)(2)(iii) and 156.10(a)(5)(vii).

162. Ipax's distribution or sale of **IPAX S10 Sanitizer**, EPA Reg. No. 1839-86-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

163. Ipax's violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. §136l(a).

Counts 21 – 22

IPAX S200 Sanitizer, EPA Reg. No. 1839-189-5166

Count 21

164. All preceding paragraphs are incorporated by reference.

165. On or about March 4, 2013, Ipax distributed or sold **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, to IPAX Atlantic Warehouse, that was misbranded as that term is defined at Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), because the label on the

container did not contain language required under “Environmental Hazards.” See also 40 C.F.R. §§ 156.10(a)(1)(vii) and 156.80 and 156.85.

166. Ipax’s distribution or sale of **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

167. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Count 22

168. All preceding paragraphs are incorporated by reference.

169. On or about July 30, 2014, Ipax distributed or sold **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, to Lakeshore-Rickman LLC, that was misbranded as that term is defined at Section 2(q)(1)(G) of FIFRA, 7 U.S.C. § 136(q)(1)(G), because the label on the container did not contain language required under “Environmental Hazards.” See also 40 C.F.R. §§ 156.10(a)(1)(vii) and 156.80 and 156.85.

170. Ipax’s distribution or sale of **IPAX S200 Sanitizer**, EPA Reg. No. 1839-189-5166, constitutes an unlawful act pursuant to Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E).

171. Ipax’s violation of Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), subjects the registrant, Stepan, to the issuance of an Administrative Complaint assessing a civil penalty under Section 14(a) of the FIFRA, 7 U.S.C. § 136l(a).

Civil Penalty and Other Relief

172. Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(4), requires the Administrator to consider the size of the business of the person charged, the effect on the person’s ability to

continue in business, and the gravity of the violation, when assessing an administrative penalty under FIFRA.

173. Based on an evaluation of the facts alleged in this CAFO, the factors in Section 14(a)(4) of FIFRA and EPA's Enforcement Response Policy for the Federal Insecticide, Fungicide, and Rodenticide Act, dated December 2009, Complainant has determined the appropriate penalty to settle this action is \$131,440.

174. Within 30 days after the effective date of this CAFO, Respondent must pay a \$131,440 civil penalty for the FIFRA violations. Respondent must pay the penalty by electronic funds transfer, payable to the "Treasurer, United States of America," and sent to:

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
SWIFT address FRNYUS33
33 Liberty Street
New York, New York 10045
Field Tag 4200 of the Fedwire message should read:
"D 68010727 Environmental Protection Agency"

In the comment or description field of the electronic funds transfer, state Stepan Company, and the docket number of this CAFO.

175. Respondent must send a notice of payment that states Respondent's name and the case docket number to EPA at the following addresses when it pays the penalty:

Regional Hearing Clerk (E-19J)

U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Claudia Niess (LC-8J)
Pesticides and Toxics Compliance Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Nidhi K. O'Meara (C-14J)
Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

176. This civil penalty is not deductible for federal tax purposes.

177. If Respondent does not pay the civil penalty in a timely manner, EPA may refer the matter to the Attorney General who will recover such amount by action in the appropriate United States district court under Section 14(a)(5) of FIFRA, 7 U.S.C. § 136l(a)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

178. Pursuant to 31 C.F.R. § 901.9, Respondent must pay the following on any amount overdue under this CAFO. Interest will accrue on any amount overdue from the date payment was due at a rate established by the Secretary of the Treasury. Respondent must pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. In addition, Respondent must pay a 6 percent per year penalty on any principal amount 90 days past due.

General Provisions

179. Consistent with the Standing Order Authorizing E-Mail Service of Orders and ~~Other Documents Issued by the Regional Administrator or Regional Judicial Officer under the~~ Consolidated Rules, dated March 27, 2015, the parties consent to service of this CAFO by e-mail at the following valid e-mail addresses for their respective attorneys: omeara.nidhi@epa.gov (for Complainant), and Novak@khlaw.com (for Respondent). The parties waive their right to service by the methods specified in 40 C.F.R. § 22.6.

180. This CAFO resolves only Respondent's liability for federal civil penalties for the violations and facts alleged in this CAFO.

181. This CAFO does not affect the right of EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

182. This CAFO does not affect Respondent's responsibility to comply with FIFRA and other applicable federal, state, and local laws.

183. This CAFO is a "final order" for purposes of EPA's Enforcement Response Policy for FIFRA.

184. The terms of this CAFO bind Respondent, its successors, and assigns.

185. Each person signing this agreement certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to its terms.

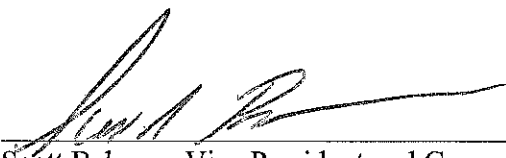
186. Each party agrees to bear its own costs and attorney's fees, in this action.

187. This CAFO constitutes the entire agreement between the parties.

**In the Matter of:
Stepan Company**

Stepan Company, Respondent

12/19/2017
Date

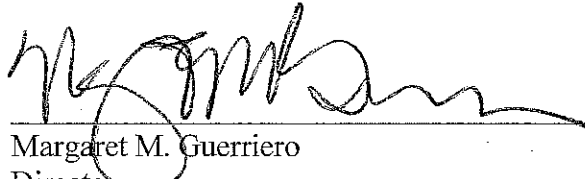


Scott Behrens, Vice President and General
Manager, Global Surfactants
Stepan Company

In the Matter of:
Stepan Company

United States Environmental Protection Agency, Complainant

1/08/2018
Date


Margaret M. Guerriero
Director
Land and Chemicals Division

In the Matter of:

Stepan Company

Docket No.

FIFRA-05-2018-0013

Final Order

This Consent Agreement and Final Order, as agreed to by the parties, shall become effective immediately upon filing with the Regional Hearing Clerk. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18 and 22.31. IT IS SO ORDERED.

January 9, 2018
Date

Ann L. Coyle
Ann L. Coyle

Regional Judicial Officer

United States Environmental Protection Agency

Region 5

Consent Agreement and Final Order
In the matter of: Stepan Company
Docket Number: **FIFRA-05-2018-0013**

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of the foregoing Consent Agreement and Final Order, docket number **FIFRA-05-2018-0013**, which was filed on January 9, 2018, in the following manner to the following addressees:

Copy by E-mail to
Attorney for Complainant:

Ms. Nidhi K. O'Meara
omeara.nidhi@epa.gov

Copy by E-mail to
Attorney for Respondent:

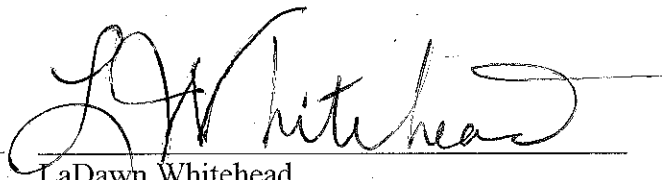
Mr. Michael T. Novak
Novak@khlaw.com

Copy by E-mail to
Regional Judicial Officer:

Ms. Ann Coyle
coyle.ann@epa.gov

Dated:

January 9, 2018


LaDawn Whitehead
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 5